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TIKTOK INC. and BYTEDANCE INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

Personal Injury Bellwether Plaintiffs

**DECLARATION OF JORI M. LOREN IN
SUPPORT OF OMNIBUS SEALING
STIPULATION REGARDING
DECLARATION OF JORI M. LOREN IN
RESPONSE TO MAGISTRATE JUDGE
KANG'S MAY 30, 2025 ORDER**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

I Jori M. Loren, declare as follows:

1. I am a partner of the law firm Faegre Drinker Biddle & Reath LLP, counsel for Defendants TikTok Inc. and ByteDance Inc. in the above-referenced matter. I make this declaration in support of the Omnibus Sealing Stipulation in connection with the Declaration of Jori M. Loren in Response to Magistrate Judge Kang's May 30, 2025 Order (Dkt. No. 2004). I have personal knowledge of the following facts and, if called as a witness in the above-referenced action, could competently testify to the matters stated herein.

2. I have reviewed the documents that TikTok seeks to redact pursuant to the Court's Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341). Based on my review of the material in the Declaration of Jori M. Loren in Response to Magistrate Judge Kang's May 30, 2025 Order, I understand there is good cause to seal the following information:

Dkt. No.	Description	Basis for Sealing
2005-4	Exh. C to Loren Decl.	The redacted portions consist of potentially explicit material interacted with by plaintiff Melton.
2005-6	Exh. E to Loren Decl.	The redacted portions consist of plaintiff D'Orazio's personal email addresses and a summary of deposition testimony the parties have designated as confidential.
2005-7	Exh. F to Loren Decl.	The redacted portions consist of the names of third-party witnesses, a summary of deposition testimony the parties have designated as confidential, and about potentially explicit material interacted with by Plaintiff M.G.
2005-8	Exh. G to Loren Decl.	The redacted portions consist of potentially explicit material interacted with by plaintiff Clevenger.
2005-9	Exh. H to Loren Decl.	The redacted portions consist of plaintiff J.D.'s last name, the names of individuals whose Facebook accounts that J.D. disclaimed, and a summary of deposition testimony the parties have designated as confidential.
2005-10	Exh. I to Loren Decl.	The redacted portions consist of a summary of deposition testimony the parties have designated as confidential and the full name of a third-party witness.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Chicago, Illinois on June 24, 2025.

/s/ Jori M. Loren
JORI M. LOREN